

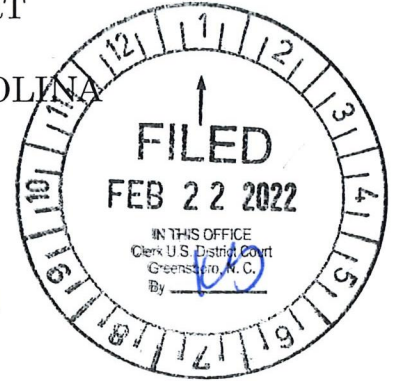
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA

v.

ASMA [NMN] RAHIM

1:22CR 28 -1



The Grand Jury charges:

Introductory Allegations

At all times relevant to this Indictment:

1. ASMA [NMN] RAHIM was a resident of Delaware.
2. Regions Bank, headquartered in Birmingham, Alabama, was a financial institution within the meaning of Title 18, United States Code, Section 20.
3. TD Bank, N.A., headquartered in Cherry Hill, New Jersey, was a financial institution within the meaning of Title 18, United States Code, Section 20.
4. Bank of America, N.A., headquartered in Charlotte, North Carolina, was a financial institution within the meaning of Title 18, United States Code, Section 20.
5. Victim-1 was university located in the Middle District of North Carolina.
6. Business-1 was a building contractor with contracts funded by

Victim-1.

Conspiracy to Commit Money Laundering

7. From on or about April 30, 2020, continuing up to and including on or about July 8, 2020, the exact dates to the Grand Jurors unknown, in the Middle District of North Carolina, and elsewhere, ASMA [NMN] RAHIM, and divers other persons, known and unknown to the Grand Jurors, did knowingly combine, conspire, and agree with each other to commit offenses against laws of the United States, to wit:

1. To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and
2. To knowingly engage and attempt to engage in monetary transactions in

criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1957.

Manner and Means of the Conspiracy

8. It was part of the conspiracy that conspirators other than the defendant committed an act of wire fraud, which defrauded Victim-1 out of approximately \$660,766, by sending an employee at Victim-1 fraudulent wiring instructions for payments associated money owed to Business-1.

9 It was part of the conspiracy that the defendant conspired with individuals to launder the proceeds of wire fraud.

10. It was further a part of the conspiracy that the defendant and her co-conspirators engaged in financial transactions whereby the proceeds of wire fraud were delivered to the defendant and her co-conspirators knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

11. It was further a part of the conspiracy that the defendant and her co-conspirators transferred funds by wire, withdrew cash, caused a cashier's

check to be issued, and purchased consumer items to conceal funds that were derived from wire fraud.

13. It was further a part of the conspiracy that the defendant and her co-conspirators engaged in monetary transactions in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of one or more of the offenses alleged above, the defendant, ASMA [NMN] RAHIM, shall forfeit to the United States any and all interest in property, real or personal, involved in such offense, or an property traceable to such property.

3. The property to be forfeited includes but is not limited to the following:

\$87,082.75 in an account ending in 8429 located at TD Bank, N.A., and
\$65,000 in an account ending in 0627 located at Bank of America, N.A.

DATED: February 22, 2022

SANDRA J. HAIRSTON
United States Attorney


BY: TANNER L. KROEGER
Assistant United States Attorney

A TRUE BILL:


FOREPERSON